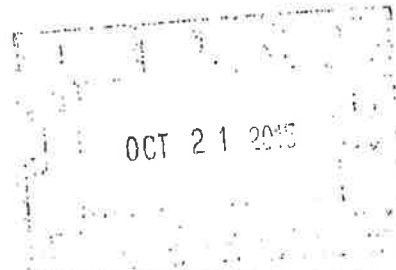


# Exhibit “A”

ANTHONY J. BRADY, JR., ESQUIRE  
1 Rose Avenue  
P O Box 129  
Maple Shade, New Jersey 08052  
(561) 603-6387

Attorney for Plaintiffs



THOMAS J. HAMILL, ADVOCATES  
FOR DISABLED AMERICANS

Plaintiffs,

vs.

YORK HOUSE EAST LTD  
YORK HOUSE EAST LTD., L.P.  
Defendant.

: SUPERIOR COURT OF NEW JERSEY  
: CAMDEN COUNTY  
: LAW DIVISION  
: Civil Action

: Docket No.: CAM -L-

: COMPLAINT

4003-15

Plaintiff Thomas J. Hamill, residing at 370 Grove Ave., Apt 106, West Deptford, Gloucester County, New Jersey and Plaintiff Advocates for Disabled Americans, doing business in Camden County New Jersey, by way of complaint against Defendant states:

**FIRST COUNT**

1. Plaintiff Hamill is disabled and uses a wheelchair. Plaintiff resides in Gloucester County, New Jersey.
2. Plaintiff Advocates for Disabled Americans (AFDA) is a civil rights organization, whose goal in part is to enforce the civil rights of the disabled with an office in Camden County.
3. Defendants are located at 214 West Main St. Moorestown, Burlington County, New Jersey, are the owner/operator of a public accommodation, which is an office building. On or about August 28, 2015, Plaintiff Hamill attempted to patronize Defendants' office building as a patron but was unable to use same due to the lack of access.

4. His ability to utilize Defendant's services was impaired due to the lack of access to the Plaintiff and the disabled as a whole.

5. Specifically, (1) designated parking spaces for the disabled are built with illegal slopes and or cross slopes; (2) designated parking spaces for the disabled are poorly maintained and have uneven surfaces; (3) one parking space designated for the disabled is not adjacent to an accessible route; and (4) routes for the disabled contain illegal ramps, slopes and cross slopes and locked entrances. Upon further investigation Defendant does not have accessible bathrooms.

6. The above violations are not exclusive. Plaintiff reserves the right to amend the allegations as discovery progresses.

7. Plaintiff Hamill intends to return to said public accommodation as a patron.

8. Plaintiff Hamill, also intends to return as a tester.

9. As a result Plaintiff sustained distress and anger.

10. The lack of access is a violation of New Jersey Law Against Discrimination (LAD) and the federal Americans with Disability Act (ADA).

11. Wherefore, Plaintiff Hamill demands judgment for:

- a. Injunctive relief and damages under the LAD.
- b. Attorney fees.
- c. Costs of suit.

#### SECOND COUNT

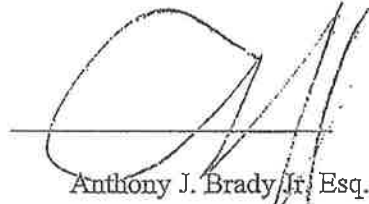
12. Plaintiff AFDA repeats the allegations of the first count.

13. Plaintiff Advocates for Disabled Americans with offices in Cherry Hill, Camden County, New Jersey and its members have suffered and will continue to suffer direct and indirect injury as a result of this discrimination.

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14. Wherefore, Plaintiff Advocates for Disabled Americans demands judgment for:
- a. Injunctive relief.
  - b. Damages under the LAD
  - c. Attorney fees.
  - d. Costs of suit.

Date: October 21, 2015.




Anthony J. Brady Jr. Esq.

#### CERTIFICATION

I further certify pursuant to R. 4.5-1, that this matter in controversy is not the subject of any court of a pending arbitration proceeding nor any other action or arbitration proceeding contemplated. Further, the Plaintiffs are not aware of any other parties that should be joined in this matter.

DATED: October 21, 2015.



ANTHONY J. BRADY JR. ESQUIRE